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Dr. Richard W. Fonté, President

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February 21, 2001

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FEB 22 2001

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

FCC MAIL ROOM

Re: ET Docket No. 00-258/FCC 00-455

Dear Ms. Salas:

This letter is in reference to ET Docket No. 00-258, FCC 00-455. Since 1992 Austin Community College (ACC) has held the licenses to the ITFS Group A, station WLX-403, Austin, Texas. Austin Community College opposes either the sharing of the ITFS/MDS band with 3G services or reallocating ITFS/MDS services to another spectrum. There are three primary reasons why the College holds this position.

1. ACCESS

The College's mission statement states that "the College exists to provide such educational opportunities to all the people of the Austin Community College service area." The distance learning program is an important method by which the College achieves this goal in its seven county service area.

ACC offered its first distance learning course, a recorded telecourse, over cable television in the spring 1979 semester. The program now has over 4,000 students with 6,000 enrollments in each of the three semesters during the academic year. During the fall 2000 semester, 36 televised courses (telecourses) were offered with 2,563 enrollments. This is 39 percent of the total distance learning enrollment.

One ITFS channel is used full-time to show college credit telecourses, informational programs about the college, registration updates, employment opportunities and ACC produced public affairs programs. This is channel 28 in the Heartland Cable Television channel lineup, the local wireless cable company. Also, in three communities Cox Communications receives the signal and retransmit it over its systems. Heartland and Cox cable companies serve primarily outlying suburban and rural areas. Thus, they provide a service that is particularly important to these students due to their distance from a campus.

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Cypress Creek Campus
1555 Cypress Creek Rd.
Cedar Park, Texas 78613
512.223.2000
FAX 223.2001

Eastview Campus
3401 Webberville Rd.
Austin, Texas 78702
512.223.5100
FAX 223.5111

Northridge Campus
11928 Stonehollow Dr.
Austin, Texas 78758
512.223.4000
FAX 223.4661

Pinnacle Campus
7748 Highway 290 W
Austin, Texas 78736
512.223.8001
FAX 223.8160

Rio Grande Campus
1212 Rio Grande
Austin, Texas 78701
512.223.3003
FAX 223.3406

Riverside Campus
1020 Grove Boulevard
Austin, Texas 78741
512.223.6000
FAX 223.6709

A second channel is used twelve hours daily for video feeds to six ACC campuses. These programs include retransmission of teleconferences received via satellite, inter-campus meetings, and faculty and staff development programs.

2. INVESTMENT

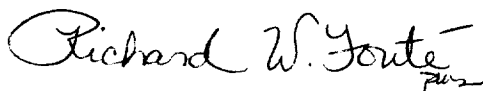
In 1993 ACC received a \$200,000 Department of Commerce NTIA. This grant was matched by \$250,000 from the College. The funds were used to equipment a small distance learning television studio and control room, part of a master control room, two microwave transmitters-receivers, and two ITFS transmitters. The College has carefully maintained this equipment and it is still being used according to its original purpose. Since initial ITFS construction, the College has invested several million dollars to expand its analog video distance learning infrastructure and to build an H.320 videoconference network. The College-wide analog and digital video networks are fully interconnected at the Pinnacle Campus master control facility.

3. FUTURE UTILIZATION OF ITFS FREQUENCIES

ACC has been working with Nucentrix, the parent company of Heartland Cable Company, to provide broadband Internet access to much of the College's service area. The City of Austin and its immediate suburbs are surrounded by rural areas where there is little, if any, access to broadband DSL or cable modem services. The College will use this system to provide high speed Internet access to sites that it operates in these areas. More importantly, this service will improve access to ACC's distance learning program which currently includes 50 Web-based courses. Internet-based distance learning courses are now an important part of ACC's distance learning program and compliments the telecourses shown on cable television.

Austin Community College urges the Commission not to change the existing allocation or use of the ITFS/MDS spectrum. The Commission should choose bandwidth for the implementation of 3G services that will not adversely affect the College's ability to meet the educational needs of students in its service area or adversely affect its substantial investment.

Sincerely,

A handwritten signature in cursive script that reads "Richard W. Fonté". The signature is written in dark ink and includes a stylized flourish at the end.

Richard W. Fonté
President